

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHERYL WULTZ, et al.,

Plaintiffs,

-against-

BANK OF CHINA LIMITED,

Defendant

No. 11 Civ. 1266 (SAS)

**DECLARATION OF MARILYN C. KUNSTLER IN SUPPORT OF MOTION
FOR WITHDRAWAL OF LEE S. WOLOSKY AND OLAV A. HAAZEN AS COUNSEL**

I, Marilyn C. Kunstler, on oath, hereby declare as follows:

1. I am an attorney in the law firm Boies, Schiller & Flexner LLP (“BSF”), counsel for Plaintiffs in the above-referenced action. I submit this Declaration in support of the Motion for Withdrawal of Lee S. Wolosky and Olav A. Haazen as Counsel in the above-captioned action pursuant to Local Civil Rule 1.4 (the “Motion for Withdrawal”), dated July 10, 2015. I make this declaration based on my personal knowledge.

2. Mr. Wolosky has been been counsel of record for Plaintiffs Sheryl Wultz, Yekutiel Wultz, and Amanda Wultz in the above-captioned action since July 31, 2012, when he and other attorneys at BSF entered notices of appearance on Plaintiffs’ behalf. Mr. Wolosky was recently appointed as President Obama’s Special Envoy for Guantanamo Closure at the United States Department of State and is taking a leave of absence from his position as partner at BSF.

3. Mr. Haazen is an attorney formerly associated with BSF who entered a notice of appearance on Plaintiffs’ behalf on August 22, 2012. Mr. Haazen left BSF earlier this year, and ceased representing Plaintiffs as of that time.

4. Mr. Wolosky and Mr. Haazen have both consented to the filing of this Motion for Withdrawal and have stated they have no objection to their appearances in the above-captioned action being withdrawn.

5. BSF, including the other BSF attorneys who are counsel of record for Plaintiffs in the above-captioned litigation, have continued to represent Plaintiffs in the litigation since Mr. Haazen left BSF, and will continue to do so during Mr. Wolosky's leave of absence from the firm. I accordingly expect that the requested withdrawals will have no impact on the schedule in the litigation.

WHEREFORE, I respectfully request that the Court grant the Motion for Withdrawal.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 10, 2015
New York, New York



Marilyn C. Kunstler